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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

REYNALDO STOCKER,

Defendant.

Case No. 2:20-cr-00287-JAD-BNW

**Stipulation to Continue
Deadline for Government's Response to
Defendant's Motion to Compel [ECF No. 39]
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, through Mina Chang and Allison Reese, Assistant United States Attorneys, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Nisha Brooks-Whittington and Katherine A. Tanaka, Assistant Federal Public Defenders, counsel for defendant Reynaldo Stocker, that the deadline for the Government's Response to Defendant's Motion to Compel (ECF No. 39), currently set for Tuesday, September 21, 2021, be vacated and continued for two weeks, up to and including Tuesday, October 5, 2021.

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1 This Stipulation is entered into for the following reasons:

- 2 1. Government counsel needs an additional two weeks, up to and including Tuesday,
3 October 5, 2021, to complete its research, draft, and finalize an appropriate response
4 to the defendant's motion (ECF No. 39).
- 5 2. Trial is set for January 25, 2022, and will not be negatively impacted by this brief
6 extension of time to file the Government's response.
- 7 3. The parties agree to the extension of time.
- 8 4. The requested two-week extension of time will not unduly prejudice the defendant
9 and is not sought for purposes of mere delay, but to provide the Government the
10 necessary time to file an appropriate response. For the reasons stated above, the ends
11 of justice would best be served by a continuance of the deadline.
- 12 5. Denial of this request for continuance of the deadline could result in a miscarriage of
13 justice.
- 14 6. The defendant is out of custody and does not object to the request for continuance.
- 15

16 DATED this 13th day of September, 2021.

17

18 Respectfully submitted,

19 RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

20 /s/ Nisha Brooks-Whittington
21 NISHA BROOKS-WHITTINGTON
22 KATHERINE A. TANAKA
Assistant Federal Public Defenders

/s/ Mina Chang
MINA CHANG
ALLISON REESE
Assistant United States Attorneys

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

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Case No. 2:20-cr-00287-JAD-BNW

Findings of Fact, Conclusions of Law, and Order

FINDINGS OF FACT

Based upon the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

This Stipulation is entered into for the following reasons:

1. Government counsel needs an additional two weeks, up to and including Tuesday, October 5, 2021, to complete its research, draft, and finalize an appropriate response to the defendant's motion (ECF No. 39).
2. The defendant is not in custody and does not object to the continuance.
3. Trial is set for January 25, 2022, and will not be negatively impacted by this brief extension of time to file the Government's responses.
4. The parties agree to the extension of time.
5. The requested two-week extension of time will not unduly prejudice the defendant and is not sought for the purposes of mere delay, but to provide the Government the necessary time to file a appropriate response. For the reasons stated above, the ends of justice would best be served by a continuance of the deadline.

1 6. Denial of this request for continuance of the deadline could result in a miscarriage of
2 justice.

3 7. This is the first request for a continuance of the deadline to file the response as set
4 forth herein.

5 **CONCLUSIONS OF LAW**

6 Based on the parties' Stipulation and agreement to allow the Government additional
7 time to file its response and for good cause shown, the extension of time is granted.

8 **ORDER**

9 IT IS THEREFORE ORDERED that the deadline for the Government's Response to
10 Defendant's Motion to Compel, currently scheduled for September 21, 2021, be vacated and
11 continued to October 5, 2021.

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13 DATED this 14 day of September, 2021.

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16 _____
HON. BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE